

MICHELE BECKWITH  
Acting United States Attorney  
MICHAEL G. TIERNEY  
VERONICA M.A. ALEGRIA  
Assistant United States Attorneys  
2500 Tulare Street, Suite 4401  
Fresno, Ca 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

SHANA GAVIOLA &  
JULIO SANDOVAL,  
  
Defendants.

Case No: 1:22-CR-0233-JLT

**STIPULATION AND PROTECTIVE ORDER  
BETWEEN THE UNITED STATES AND  
DEFENDANTS REGARDING PRODUCTION  
OF PROTECTED INFORMATION**

WHEREAS, the discovery in this case contains private personal information regarding third parties (both adults and minors), including but not limited to their names, dates of birth, physical descriptions, medical information, telephone numbers and/or residential addresses (“Protected Information”); and

WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the unauthorized disclosure or dissemination of this information to anyone not a party to the court proceedings in this matter;

1 The parties agree that entry of a stipulated protective order is therefore appropriate.

2 THEREFORE, defendants SHANA GAVIOLA and JULIO SANDOVAL, by and through their  
3 counsel of record, Anthony P. Capozzi, Griffin Estes, and Reed Grantham (“Defense Counsel”), and the  
4 United States of America, by and through Assistant United States Attorneys Michael G. Tierney and  
5 Veronica M.A. Alegria, hereby agree and stipulate as follows:

6 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
7 Criminal Procedure, and its general supervisory authority.

8 2. This Order pertains to all discovery provided to or made available to Defense Counsel as  
9 part of discovery in this case (hereafter, collectively known as “the discovery”). It applies to discovery  
10 produced both prior to and after the date of this Order.

11 3. By signing this Stipulation and Protective Order, from this date on Defense Counsel agrees  
12 not to share any documents that contain Protected Information with anyone other than Defense Counsel’s  
13 attorneys, designated defense investigators, designated defense experts, and support staff. Defense  
14 Counsel may permit the defendant to view unredacted documents under the supervision of his attorneys,  
15 defense investigators, and/or support staff while in the offices of defense counsel or in another location  
16 chosen by defense counsel. The parties agree that Defense Counsel, defense investigators, and support  
17 staff shall not allow the defendant to retain Protected Information contained in the discovery. The parties  
18 agree that Defense Counsel, defense investigators, and support staff may provide the defendant with  
19 copies of documents, if any, from which Protected Information has first been redacted.

20 4. The parties acknowledge that the defendants may have access to unredacted copies of items  
21 contained in the discovery because, for example, they are business records of organizations with which a  
22 defendant was associated. This Protective Order does not apply to the original unredacted documents in  
23 the possession of the defendants but does apply to copies produced as part of discovery.

24 5. The discovery and information therein may be used only in connection with the litigation  
25 of this case and for no other purpose. The discovery is now and will forever remain the property of the  
26 United States of America (“Government”). Defense Counsel will return the discovery to the government  
27 or, alternatively, keep it archived within its sole possession at the conclusion of the case.

6. Defense Counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement.

7. Defense Counsel shall be responsible for advising the Defendant, employees, and other members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

8. In the event that Defendant substitutes counsel, undersigned Defense Counsel agree to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

IT IS SO STIPULATED.

Dated: May 30, 2025

By: /s/ Anthony Capozzi  
Anthony Capozzi  
Attorney for Defendant  
Shana Gaviola

Dated: May 30, 2025

By: /s/ Griffin Estes  
Griffin Estes  
Attorney for Defendant  
Julio Sandoval

Dated: May 30, 2025

MICHELE BECKWITH  
Acting United States Attorney

By: /s/ Michael G. Tierney  
Michael G. Tierney  
Assistant U.S. Attorney

IT IS SO ORDERED.

Dated: 6/2/2025

Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE